

(iv) a decision by EPA on the permit renewal application would aid the Court. Moreover, granting a stay will not unduly prejudice CLF.

In support of this Motion, ExxonMobil respectfully directs the Court's attention to ExxonMobil's Memorandum of Law in Support of Its Motion to Stay Pursuant to the Doctrine of Primary Jurisdiction and supporting Declaration, filed herewith, and to any additional arguments that may be properly presented in support of the requested relief in this motion.

REQUEST FOR ORAL ARGUMENT

Defendants respectfully request oral argument on this Motion.

Respectfully submitted this 5th day of April, 2019,

EXXON MOBIL CORPORATION,
EXXONMOBIL OIL CORPORATION,
EXXONMOBIL PIPELINE COMPANY

By their attorneys,

/s/ Daniel J. Toal

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ExxonMobil Pipeline Company*

CERTIFICATION PURSUANT TO LOCAL RULE 7.1(A)(2)

I hereby certify that the parties have previously conferred with respect to the relief requested in this motion and have attempted in good faith to resolve or narrow the issue, but have been unable to do so.

/s/ Deborah E. Barnard

Deborah E. Barnard

CERTIFICATE OF SERVICE

I, Deborah E. Barnard, hereby certify that, in accordance with Local Rule 5.2(b), this motion was filed through the ECF system on April 5, 2019 and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

/s/ Deborah E. Barnard

Deborah E. Barnard